



"I will stand for my client's rights.  
I am a trial lawyer."  
Ron Motley (1944-2013)

**APPLICATION GRANTED  
SO ORDERED** *Vern Bro*  
**VERNON S. BRODERICK**

**U.S.D.J.** 11/7/2022

Plaintiffs shall file their memorandum of law in accordance with the redactions proposed in Doc. 1360.

May 24, 2021

**VIA CM/ECF**

The Honorable Vernon S. Broderick  
United States District Court Judge  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 415  
New York, NY 10007

Re: *In re Keurig Green Mountain Single-Serve Coffee Antitrust Litig.*, MDL No. 2542; Master Docket No. 1:14-md-02542-VSB-SLC: Request to File Under Seal Portions of the Direct Purchaser Plaintiffs' Memorandum of Law in Support of their Motion for Class Certification, and the Appointment of Class Representatives and Class Counsel and Exhibits

Dear Judge Broderick:

We write as counsel for the Direct Purchaser Plaintiffs ("Plaintiffs") in accordance with Section 5.B of Your Honor's Individual Rules & Practices in Civil Cases, to request leave to file under seal or to redact limited portions of the Plaintiffs' Memorandum of Law in Support of their Motion for Class Certification, and the Appointment of Class Representatives and Class Counsel ("Memorandum") as well as the exhibits contained in the Declaration of Michael M. Buchman dated May 24, 2021 ("Buchman Decl.").

Plaintiffs respectfully request that the highlighted portions of the Memorandum and the entirety of Exhibits B, C, D, E, F, G, H, I and J be sealed because they contain information designated as "Confidential" or "Highly Confidential" by Plaintiffs and Keurig pursuant to the Stipulated Amended Protective Order. *See* ECF No. 496.

Accordingly, Plaintiffs respectfully request that the Court permit the portions of the Memorandum and the entirety of Buchman Decl., Exhibits B, C, D, E, F, G, H, I and J to be filed under seal.

Respectfully submitted,

/s/ Michael M. Buchman

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Enclosures  
cc: Counsel for All Parties (via CM/ECF)